

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GAVRIELI BRANDS LLC, a California  
Limited Liability Company,

Plaintiff,

v.

C.A. No. 1:18-cv-00462-GMS

SOTO MASSINI (USA)  
CORPORATION, a Delaware  
corporation; SOTO MASSINI S.R.L.S., an  
Italian limited company; and THOMAS  
PICHLER, an individual,

Defendants.

**DECLARATION OF STEPHEN M. LOBBIN IN SUPPORT OF MOTION BY  
DEFENDANTS' FORMER COUNSEL TO WITHDRAW**

I, Stephen M. Lobbin, declare and state as follows:

1. I am Founding Partner of the law firm SML Avvocati P.C., which in mid-2019 represented Defendants as patent and IP litigation counsel at trial in this action, and for purposes of post-judgment motion practice. I have personal knowledge of the facts stated herein, and if called to testify as a witness, I could and would testify competently thereto.

2. This Court's Local Rule 83.7 ("Substitution and Withdrawal of Attorney) requires a motion to withdraw as counsel of record to be "served on the party client, at least 14 days before the motion is presented, by registered or certified mail addressed to

the client's last known address." On November 2, 2020, I sent all papers related to the present Motion to Defendants' last known address by certified mail.

3. As Plaintiff's counsel is aware, for more than a year I, Mr. Richardson and Mr. Stamoulis have had no relationship—much less any attorney-client relationship—with Defendants.

Pursuant to 28 U.S.C. 1746, I hereby declare under penalty of perjury under the Laws of the United States of America that the foregoing is true and correct. If called to testify, I could and would competently do so.

Executed on this 16th day of November 2020 at San Diego, California.

/s/ Stephen M. Lobbin

**CERTIFICATE OF SERVICE**

I certify that on November 16, 2020, a true and correct copy of the foregoing document was served via email on all counsel of record.

/s/ Stephen M. Lobbin